

National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



June 9, 2014

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Guidance Regarding Attendance by NASA employees at the Space Exploration Technologies Corporation Reception, June 10, 2014

On Tuesday, June 10, 2014, Space Exploration Technologies Corporation (SpaceX) will host a standing reception with appetizers and beverages at the Newseum in Washington, D.C. from 6:30 p.m. to 9:00 p.m. The reception is to provide interested parties with an opportunity to view SpaceX's Dragon spacecraft.

Over 1,000 people have been invited to attend the event, including members of Congress and congressional staff, state and local officials, representatives from academia, industry, the media, and other Federal agencies, as well as members of the general public. The estimated average value of refreshments served at the event, including all food and beverages, is \$20.00 per person. We also understand that SpaceX will be providing gift items with the SpaceX logo with a value not exceeding \$5.

Under the \$20 gift exception at 5 C.F.R. §2635.204(a), invited NASA employees (other than as explained below) may attend without reimbursing the host so long as they do not accept refreshments and gifts worth more than \$20 at the event, or worth more than \$50 from SpaceX under this exception during 2014. So, for example, attendees consuming a moderate level of refreshments and declining the other gift items may attend without reimbursing, while those who consume a moderate amount and accept the gift items should reimburse SpaceX \$25 to ensure compliance. *NASA attendees are, however, reminded: 1) that it is never inappropriate and frequently prudent to reimburse a contractor host for the value of attendance even if attending without reimbursement is permitted, and 2) to ensure that their attendance at a contractor hosted event does not generate any appearance of preference or endorsement.*

Non-career NASA employees subject to the ethics pledge under Executive Order 13490 may only attend if they reimburse SpaceX the full value of any refreshments consumed or gifts accepted, even if none of the caps above are exceeded.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone